

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of

Application of Speedcast Communications) Call Sign: E050018
Inc. for 60-day Special Temporary)
Authorization (“STA”)) File No. SES-STA-_____

APPLICATION FOR SPECIAL TEMPORARY AUTHORIZATION

Pursuant to Section 25.120 of the rules of the Federal Communications Commission (the “FCC” or “Commission”),¹ Speedcast Communications Inc. (“Speedcast”, formerly “NewCom International Inc.”)² respectfully seeks 60-day special temporary authorization (“STA”), commencing on Thursday, March 5, 2020 or as soon as practicable thereafter, to operate two (2) earth stations at its Miami teleport during the pendency of its underlying long-term application for the identical operations.³ Specifically, Speedcast seeks temporary authority to operate a 2.4m Prodelin Model 1251 for transmit-only operations in the 5.925-6.425 GHz band, and a 13m Vertex Model K13K for operations in the 14.0-14.5 GHz (Earth-to-space) and 11.7-12.2 GHz (space-to-Earth) bands.

Grant of this STA will serve the public interest because it will enable Speedcast to implement reliable satellite connectivity backup to accommodate broadband service interruptions affecting customers in remote areas of Alaska that are unable to rely on traditional terrestrial infrastructure for basic communications. Moreover, Speedcast will use the 13m Vertex to provide improved

¹ 47 C.F.R. § 25.120.

² NewCom recently transferred control of the subject license to Speedcast Americas Inc., its parent company. (See File No. SES-T/C-20160121-00093).

³ See Speedcast Communications Inc., File No. SES-AMD-20200224-00199, Call Sign E050018 (“Miami Teleport Application”), amending NewCom International Inc., File No. SES-MOD-20190225-00190, Call Sign E050018.

capacity resources to maritime customers, including cruise ship crew, staff and guests, to ensure continuous connectivity while at sea and in-port.

I. Discussion

This STA seeks authority to operate two (2) new earth stations at Speedcast's existing Miami teleport. First, the 2.4m Prodelin is on the Commission's Non-Routine Antenna List and has been previously approved to operate in the 5.925-6.425 GHz band at higher EIRP spectral density levels than those sought herein.⁴ Although the 2.4m Prodelin does not comply with the gain mask in Section 25.209 of the Commission's rules, as a means to mitigate the potential for increased interference, Speedcast will operate the earth station at EIRP and EIRP spectral density levels below those currently authorized in the subject license and in compliance with the ESD mask set forth in Section 25.218(d) of the Commission's rules.⁵ The 2.4m Prodelin will communicate with the EUTELSAT 115WB satellite located at the 114.9° W.L. orbital position.

Second, Speedcast seeks to operate the 13m Vertex in the 14.0-14.5 GHz (Earth-to-space) and 11.7-12.2 GHz (space-to-Earth) bands at EIRP spectral density levels well below those currently authorized for Ku-band operations under Call Sign E050018, at all times in compliance with the relevant EIRP spectral density mask in Section 25.218(f) of the Commission's rules.⁶ The 13m Vertex will communicate with INTELSAT-904 satellite located at the 29.5° W.L. orbital position.

Therefore, both the 2.4m Prodelin and 13m Vertex will operate in conformance with the routine uplink parameters specified in Section 25.218 of the Commission's rules. As demonstrated

⁴ See Approved Non-Routine Earth Station Antennas, <https://www.fcc.gov/approved-non-routine-earth-station-antennas>; e.g., Intelsat LLC, File No. SES-LIC-20080717-00949, Call Sign E080170.

⁵ See 47 C.F.R. § 25.218(d).

⁶ See 47 C.F.R. § 25.218(f).

in the attached Technical Appendix, operation of the earth stations will be fully consistent with the Commission’s spectrum management policies, including two-degree satellite spacing, and will not adversely affect the operations of other spectrum users. Speedcast provides the *pro forma* FCC Form 312 Schedule B and Technical Appendix for relevant information relating to the proposed operations, including frequencies and power levels, a radiation hazard analysis and a frequency coordination report.⁷

a. Temporary Freeze on FSS Applications in the 3.7-4.2 GHz band

Speedcast acknowledges the Commission’s Public Notice placing a temporary freeze on the filing of all new or modification applications for earth stations in the 3.7-4.2 GHz band, effective as of April 19, 2018.⁸ The *Temporary Freeze Public Notice* does not include a freeze on requests for special temporary authority for short-term operations, and thus the instant request to operate the 2.4m Prodelin is outside the scope of the freeze. Nevertheless, Speedcast does not seek authority to operate in C-band receive frequencies from 3.7-4.2 GHz.

b. Frequency Coordination

Speedcast engaged Comsearch to perform frequency coordination analysis for the 2.4m Prodelin, which was completed on February 14, 2020. Pursuant to Sections 25.115(c)(2)(ii) and 25.203 of the Commission’s rules, 47 C.F.R. §§ 25.115(c)(2)(ii) and 25.203, Comsearch has conducted a coordination analysis on behalf of Speedcast that considers all existing, proposed and

⁷ Speedcast notes that the frequency coordination report for the 2.4m Prodelin was prepared using worst-case scenario power levels and, in reality, Speedcast will operate the antenna at a much lower EIRP spectral density level (*see* Form 312 Schedule B).

⁸ *See* Public Notice, *Temporary Freeze on Applications for New or Modified Fixed Satellite Service Earth Stations and Fixed Microwave Stations in the 3.7-4.2 GHz Band, 90-Day Window to File Applications for Earth Stations Currently Operating in the 3.7-4.2 GHz Band*, DA 18-398 (rel. on April 19, 2018) (“*Temporary Freeze Public Notice*”). *See also*, Public Notice, GN Docket Nos. 17-183, 18-122, “International Bureau Announces 90-Day Extension of Filing Window, to October 17, 2018, to File Applications for Earth Stations Currently Operating in 3.7-4.2 GHz Band; Filing Options for Operators with Multiple Earth Station Antennas,” DA 18-639 (rel. Jun. 21, 2018).

prior coordinated microwave facilities within the contours of the 2.4m Prodelin at the Miami teleport.

As demonstrated in the attached frequency coordination report, as coordinated and limited,⁹ there is no potential for interference between other users of the C-band spectrum and the operations of the 2.4m Prodelin at the Miami facility, and Speedcast's proposed operations are fully compatible with other FCC-licensed operations in the band. All potential interference cases that were identified have been resolved through operational limitations, and Comsearch has concluded that the site will operate satisfactorily with the common carrier microwave environment. Speedcast will coordinate any additional operations prior to bringing them into operation under the license.

II. STA Request & Public Interest Considerations

Section 25.120(a) provides that an STA request should be filed at least three business days prior to commence of proposed operations. Here, Speedcast has timely filed this 60-day STA request so that the Commission may permit operations by March 5, 2020. Moreover, Section 25.120(b)(2) states that the Commission may grant a temporary authorization for up to 60 days if the STA request has not been placed on public notice and the applicant plans to file a request for regular authority for the service. As noted, the *Miami Teleport Application* requesting the identical operating authority is on file with the Commission and this STA will ensure Speedcast has appropriate authority during the Commission's review of the long-term request.

Grant of this 60-day STA will strongly serve the public interest by allowing Speedcast to accommodate any unexpected service interruption to the remote Alaskan communities that rely on

⁹ As demonstrated in the frequency coordination report and Form 312 Schedule B, Speedcast will limit its operations to certain segments of the 5.925-6.425 GHz band to eliminate the potential for interference into authorized co-frequency operations.

its broadband services for basic connectivity needs. More generally, this STA will help to bridge the digital divide by giving businesses and residents in these communities access to more reliable broadband connectivity. This STA will also ensure continuous services to staff, crew and guests onboard cruise ships and provide improved 24/7 ground station support for U.S. maritime customers using the 13m Vertex.

III. Conclusion

Based on the foregoing, the public interest would be served by a grant of Commission authority to Speedcast to operate the 2.4m Prodelin and 13m Vertex for 60-days commencing on Thursday March 5, 2020, or as soon as possible thereafter.